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July 12, 2013

Gary Miller, Remedial Project Manager  
U.S. Environmental Protection Agency, Region 6  
Superfund Division (6SF-RA)  
1445 Ross Avenue, Suite 1200  
Dallas, Texas 75202-2733

Re: Vegetation Control and Herbicide Application(s) on the Time Critical Removal  
Action Armored Cap, San Jacinto River Waste Pits Superfund Site, Channelview,  
Texas

Dear Gary:

As we have discussed, McGinnes Industrial Maintenance Corporation and International Paper Company, the Respondents at the San Jacinto River Waste Pits Superfund Site, propose to conduct vegetation control measures on the portions of the Time Critical Removal Action armored cap that are above the tidal elevation of the river.

On July 8, 2013, a site investigation was conducted, at the request of the Respondents, by Benchmark Ecological Services, Inc. (BESI) to determine the extent of the vegetation growth on the armored cap. Several species of vegetation were observed. Species found on the elevated rock levees included Chinese Tallow (*Triadica sebifera*), Salt Myrtle (*Baccharis halimifolia*), Salt Cedar (*Tamarix gallica*), and Huisache (*Acacia farnesiana*). The density of these species appeared to be the greatest around the higher elevations along the perimeter of the site, while lower areas in the middle of the western cell of the cap showed scattered growth. Additionally, Smooth Cordgrass (*Spartina alterniflora*), Saltgrass (*Distichlis spicata*), and Southern Cattail (*Typha domingensis*) were observed near the water's edge. Approximately 0.4 acres of more dense vegetation, and approximately 2.2 acres of 10 percent scattered growth were observed in total.

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Proposed vegetation control measures include cutting woody vegetation at the base of each plant down to the surface of the cap, cutting grasses growing above the water line with a string trimmer, removing cut vegetation from the site, and conducting herbicide applications. The objective of the vegetation control measures is to remove unwanted vegetation from the cap. A two-phase approach to control the vegetation currently growing on the cap is proposed. The vegetation control measures will be performed by BESI with oversight by Anchor QEA.

### **Phase 1 - Vegetation Control Procedures**

*Scrub Shrub* - The scrub shrub (woody) vegetation growing on top of the armored cap will be removed. Each plant will be cut cleanly at the base with a handheld saw, pruning shears, or string trimmer. The stump of each plant will then be treated with Remedy Ultra® herbicide to prevent future re-growth. Remedy Ultra® does not require a permit for purchase or application. Cut vegetation will be loaded onto BESI trailers and hauled off-site for disposal.

*Grasses* – Grasses growing on the rock cap will be cut with a gas powered string trimmer. The stems of the cut grasses will then be treated with Touchdown Pro® herbicide applied from a pump sprayer mounted in the back of a BESI ATV. A portable handheld sprayer will be used in areas inaccessible by ATV. Touchdown Pro® does not require a permit for purchase or application. Large clumps of cut grass will also be hauled off-site. Emergent vegetation, such as Smooth Cordgrass, near the water's edge will not be treated with herbicide or removed during the activities outlined in this proposal.

### **Phase 2 - Vegetation Control**

Due to the persistent nature of Chinese Tallow, Salt Cedar, and other plant species listed above, a second round of vegetation control measures will be performed one month after the completion of the Phase 1 vegetation control event. This will involve the same activities described above in the Phase 1 Vegetation Control Procedures.

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## Schedule

The proposed vegetation control program will begin within two weeks of U.S. Environmental Protection Agency (USEPA) approval if weather, tide, and access conditions allow those activities. Please let us know if you have any concerns with the proposed vegetation control measures, and do not hesitate to contact me if you would like to discuss anything.

Sincerely,



David C. Keith  
Project Coordinator  
Anchor QEA, LLC

Cc: Phil Slowiak, International Paper Company  
Dave Moreira, McGinnes Industrial Maintenance Corporation  
Valmichael Leos, USEPA Region 6  
John Laplante, Anchor QEA

Attachments

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